

Appl. No. 09/692,709  
Supplemental Amdt. Dated January 28, 2005  
Supplemental Reply to Office action of September 30, 2004  
Attorney Docket No. P12266/45687-00036  
EUS/J/P/05-6016

### REMARKS/ARGUMENTS

#### **1.) Claim Amendments**

Claim 2 has previously been cancelled. Claim 3 has been cancelled and its limitations incorporated into now amended independent Claim 1. Applicant respectfully submits no new matter has been added. Accordingly, Claims 1 and 4-23 are pending in the application. Favorable reconsideration of the application is respectfully requested in view of the foregoing amendments and the following remarks.

#### **2.) Claim Rejections – 35 U.S.C. § 102(b)**

Previously pending independent Claims 1 and 17 were rejected under 35 U.S.C. 102(b) as being anticipated by Chadwick. In response to the Applicant's remark filed on November 17, 2004 arguing that a single user environment as disclosed by Chadwick was distinguishable from the present invention, the Examiner instead issued an Advisory Action repeating the previous rejection that "Chadwick specifically shows the requirement of not having to use certificates as seen on page 18, under the section Requirements of the ICE-TEL Trust Model and continuing through the beginning of page 19." Applicant respectfully traverses the Examiner's rejection and has now further amended independent Claims 1 and 17 to more clearly and distinctly claim the subject matter which Applicant considers as his invention. More specifically, those limitations of dependent claim 3 have been incorporated into independent Claim 1. Similar limitations have been added to independent Claim 17 as well.

*Assuming arguendo* that the Examiner is indeed correct in stating that the ICE-TEL Trust Model in Chadwick requires no certificates or CRLs, Applicant submits that Chadwick still fails to anticipate or render obvious other steps as recited by the currently pending independent claims. More specifically, in accordance with the teachings of the present invention and as further recited in independent Claims 1 and 17, once an X-node within the trust group is identified as having a trust relationship with a particular candidate node wishing to join that trust group, the X-node then distribute the trust relationship between all members in the trust group and the newly joining candidate node by distributing the public keys associated with the candidate node to all other

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members of the trust group. The X-node further sends a signed message comprising a list of nodes that the X-node trusts within the ad hoc communication network (the trust group) and all corresponding public keys to the candidate node as well. Therefore, by having the X-node communicate the public key associated with the candidate node to all other members of the trust group as well as providing the candidate node with the public keys of those members, the trust group is updated to include all members.

Applicant respectfully submits that such steps of distributing the public keys between the candidate node and the members of the trust group by the X-node are not disclosed or taught by Chadwick. The Examiner incorrectly cited page 19 of Chadwick as allegedly disclosing the recited step of distributing the public keys. However, Applicant respectfully submits that Chadwick mentions nothing about the X-node within the trust group distributing the public keys associated with other trusted members of the trust group to the newly joining candidate key and likewise distributing the trusted key of the candidate node to other members of the group. Chadwick, however, merely states that "[t]he public key will initially be distributed by some out-of-band proprietary means, and the ICE-TEL model does not mandate any specific mechanism for this" (Chadwick, page 19, right column, last paragraph entitled "Trusted Point"). However, this public key mentioned in Chadwick has nothing to do with the trusted key of the candidate node which needs to be distributed to all members of the trust group in accordance with the teachings of the present invention.

Since Chadwick fails to anticipate or render obvious each and every element of the pending independent claims, Applicant respectfully submits that now amended independent Claims 1 and 17 are allowable over the cited references and a Notice of Allowance is respectfully requested.

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### CONCLUSION

In view of the foregoing remarks, the Applicant believes all of the claims currently pending in the Application to be in a condition for allowance. The Applicant, therefore, respectfully requests that the Examiner withdraw all rejections and issue a Notice of Allowance for all pending claims.

The Applicant requests a telephonic interview if the Examiner has any questions or requires any additional information that would further or expedite the prosecution of the Application.

Respectfully submitted,

  
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